Amendments to the Claims:

This listing of claims will replace all prior versions and listings of claims in the application.

Listing of Claims:

1. (Currently Amended) ~~An anti-money laundering system operating on a~~ A computing system operable to implement an anti-money laundering system, the computing system ~~containing encoded data that when executed provides risk assessment determinations at a branch of a financial institution, the anti-money laundering system~~ comprising:

computer data memory;

a risk assessor module stored on the computer data memory, wherein when executed by the computing system, the risk assessor module configures the computing system ~~operating on the computing system and configured~~ to provide to an authorized user of the anti-money laundering ~~system,~~ system guidelines in identifying risk dimensions associated with potential money laundering transactions processed by the branch of the financial institution;

a policy builder module stored on the computer data memory, wherein when executed by the computing system, the policy builder module configures the computing system ~~operating on the computing system and configured~~ to recommend possible electronic and manual countermeasures to the risks identified by the risk assessor module and to enable the authorized user to select the countermeasures of his choice in order to create a policy for the branch of the financial institution;

an account opening due diligence module stored on the computer data memory, wherein when executed by the computing system, the account opening due diligence module configures the computing system ~~operating on the computing system and configured~~ to provide detailed recommendations to the authorized user as to whether to allow an application for an account at the branch of the financial institution and to apply consistent implementation of the policy throughout the branch of the financial institution;

a transaction activity monitor module stored on the computer data memory, wherein when executed by the computing system, the transaction activity monitor module configures the computing system ~~operating on the computing system and configured~~ to receive and monitor

transaction information stored on a plurality of databases communicatively connected to the computing system, the transaction information including transaction information received by the account opening due diligence module, the ~~executing~~ transaction activity monitor module further ~~configured~~ configuring the computing system to identify risk dimensions associated with potential money laundering transactions processed by the branch of the financial institution, to assign numerical designations for the risk dimensions identified for the branch of a financial institution, and to identify suspicious patterns among the transactions at the branch of a financial institution in order to provide a suspicious transaction activity report relating to a potential money laundering transaction that includes a scenario explaining the potential money laundering transaction based on the suspicious patterns; and,

a case management and reporting module stored on the computer data memory, wherein when executed by the computing system, the risk assessor module configures the computing system ~~operating on the computing system and configured~~ to track and identify the detailed recommendations resulting from the execution of the account opening due diligence module in order to provide continuous feedback to the authorized user about the effectiveness of the system;

wherein identifying suspicious patterns among the transactions includes determining whether a financial transaction to be conducted has a risk-related dimension;

determining whether the numerical designation of at least a selected one of the identified risk dimensions for the financial transaction to be conducted exceeds a predetermined level when the financial transaction to be conducted does have a risk-related dimension; and

performing a special risk assessment procedure if the numerical designation of at least a selected one of the identified risk dimensions exceeds a predetermined level.

2. (Currently Amended) The computing ~~anti-money laundering~~ system of claim 1, further comprising:

a staff training and policy management module stored on the computer data memory, wherein when executed by the computing system, the staff training and policy management module configures the computing system ~~configured~~ to use the selected countermeasures to

develop customized training programs and to track compliance of users of the anti-money laundering system.

3. (Currently Amended) The computing ~~anti-money laundering~~ system of claim 1, wherein the risks identified by the executing risk assessor module comprise geographic location risk, types of customers served, and types of services offered by the financial institution.

4. (Currently Amended) The computing ~~anti-money laundering~~ system of claim 1, wherein the executing policy builder module provides detailed support for the decision process in creating the policy.

5. (Currently Amended) The computing ~~anti-money laundering~~ system of claim 1, wherein the authorized user may override for the branch of the financial institution, the detailed recommendations provided by the executing account opening due diligence module.

6. (Currently Amended) The computing ~~anti-money laundering~~ system of claim 1, wherein the transaction information received and monitored by the executing transaction activity monitor module further comprises historical data.

7. (Currently Amended) The computing ~~anti-money laundering~~ system of claim 6, wherein the transaction information received and monitored by the executing transaction activity monitor module further comprises input from employees of the branch of the financial institution.

8. (Currently Amended) The computing ~~anti-money laundering~~ system of claim 5, wherein the executing case management and reporting module tracks and identifies the detailed recommendations of the account opening due diligence module that are overridden by the authorized user, and updates the account opening due diligence module based on the override.

9. (Currently Amended) The computing ~~anti-money laundering~~ system of claim 1, wherein the risks identified by the executing risk assessor module are used to determine the level of review applied against a selected operation or transaction.

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10. (Currently Amended) The <u>computing</u> ~~anti-money laundering~~ system of claim 9, wherein the level of review is selected from the group consisting of standard review and special review.

11. (Currently Amended) The <u>computing</u> ~~anti-money laundering~~ system of claim 1, wherein the <u>computing</u> system is communicatively coupled to an electronic network including a plurality of databases, and wherein the <u>executing</u> transaction activity monitor <u>module</u> component gathers information stored on the plurality of databases in order to monitor the suspicious transactions, and processes the information to output the risk assessment guidelines and an explanation of the risk assessment guidelines.

12. (Currently Amended) A computer implemented method having a computing system containing encoded data that when executed provides anti-money laundering risk assessment determinations at a branch of a financial institution, the method comprising ~~the steps of~~:

    <u>receiving information relating to potential money laundering transactions processed by the branch from a plurality of databases via an electronic network coupling of the computing system;</u>

    <u>retrieving risk-related data associated with the branch from a knowledge data memory;</u>

    <u>processing, by the computing system, the received information and the risk-related data</u> <u>to identify</u> ~~identifying~~ risk dimensions associated with <u>the</u> potential money laundering transactions ~~stored in at least one of a plurality of databases and processed by the branch of the financial institution~~;

    assigning, via the computing system, numerical designations for the risk dimensions identified for the branch of a financial institution;

    identifying a type of financial transaction to be conducted at the branch of a financial institution;

    determining whether a financial transaction to be conducted has a risk-related dimension;

    determining whether the numerical designation of at least a selected one of the identified risk dimensions for the financial transaction to be conducted exceeds a predetermined level when the financial transaction to be conducted does have a risk-related dimension;

performing a special risk assessment procedure if the numerical designation of at least a selected one of the identified risk dimensions exceeds a predetermined level; ~~and,~~

transmitting ~~providing to an authorized user, via the computing system,~~ recommended guidelines via the electronic network coupling to an authorized user for handling the financial transaction to be conducted, based on the special risk assessment ~~procedure.~~ procedure; and

transmitting recommended possible electronic and manual countermeasures to the identified risk dimensions to enable an authorized user to select the countermeasures of his choice in order to create a policy for the branch of the financial institution.

13. (Currently Amended) The method of claim 12, further comprising ~~the step of~~:

performing a standard risk assessment procedure if the numerical designation of none of the identified risk dimensions exceeds a predetermined level.

14. (Currently Amended) The method of claim 12, wherein the risk dimensions ~~comprises~~ comprise:

a first risk dimension representing a risk due to a location of the branch of the financial institution;

a second risk dimension representing a risk due to selected services offered by the branch of a financial institution;

a third risk dimension representing a risk due to an identified nature of the customers served by the branch of a financial institution; and,

a fourth risk dimension representing a risk due to a particular jurisdiction served by the branch of a financial institution.

15. (Cancelled)

16. (Previously Presented) The method of claim 14, wherein each of the selected services has associated accounts, each of the associated accounts having a risk rating and a risk exposure rating, and wherein each risk dimension is based on the risk rating and the risk exposure rating of all associated accounts of all of the selected services.

17. (Previously Presented) The method of claim 16, wherein the second and the third risk dimensions are based on data collected from the selected services.

18. (Currently Amended) The method of claim 14, further comprising ~~the step of~~:

performing a standard risk assessment procedure if it is determined that the financial transaction to be conducted does not have a risk-related dimension, wherein the standard risk assessment is based on the average of the numerical designation for all of the risks.

19. (Previously Presented) The method of claim 14, wherein the type of the financial transaction to be conducted at the branch of a financial institution comprises opening an account, and wherein the risk dimension for the account opening is based on the risk due to the identified nature of the customers served by the branch of the financial institution.

20. (Previously Presented) The method of claim 19, wherein the identified nature of the customers served by the branch of the financial institution includes high-risk clientele, and wherein the special risk assessment procedure is performed for the account opening.

21. (Original) The method of claim 13, wherein when it is determined to perform a special risk assessment procedure for a financial transaction, the special risk assessment procedure is performed semi-annually, and wherein when it is determined to perform a standard risk assessment procedure for a financial transaction the standard risk assessment is performed annually.

22. (Previously Presented) The method of claim 12, further comprising the step of:

overriding by an authorized user the recommended guidelines for handling the financial transaction to be conducted.

23. (Currently Amended) The method of claim 22, wherein the authorized user provides alternative guidelines after the ~~step of~~ overriding the recommended guidelines for handling the financial transaction to be conducted.

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